



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 9, 2021

**BY ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **United States v. Robert Hadden,**  
**S1 20 Cr. 468 (RMB)**

Dear Judge Berman:

The Government respectfully writes, with the consent of defense counsel, to propose a schedule for pretrial filings in the above-captioned case. As the Court is aware, trial in this case is currently scheduled to begin on March 21, 2022. The parties have conferred and would respectfully propose the following pretrial schedule, subject to any revisions by the Court:

<b>Date</b>	<b>Event</b>
Jan. 3, 2022	Government to provide expert notice to defendant
Jan. 17, 2022	Defendant to provide expert notice to Government
Jan. 31, 2022	Government to provide notice pursuant to Fed. R. Evid. 404(b) to defendant
Feb. 7, 2022	Motions <i>in limine</i> and motions regarding expert witnesses
Feb. 21, 2022	Joint proposed request to charge, voir dire and verdict sheet
Feb. 28, 2022	Responses to motions <i>in limine</i> and motions regarding expert witnesses
Mar. 16, 2022	Final pretrial conference

The parties are still in discussions as to whether to request a jury questionnaire be administered, and regarding appropriate deadlines for the disclosure of victims' names, materials pursuant to the Jencks Act, 18 U.S.C. § 3500, exhibit lists, and witness lists. We will continue to work to try to reach agreement on these issues.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Defense Counsel (By ECF)